



WILLIAMS, PORTER, DAY & NEVILLE P.C.
Wyoming's Law Firm

Exhibit F

Amazon Defendants' Motion for Protective Order
DeBeer v. Amazon Logistics, Inc., et al.

CAUSE NO. D-1-GN-22-000664

DIMITRULA VELEZ, INDIVIDUALLY	§	IN THE DISTRICT COURT
AND AS REPRESENTATIVE OF THE	§	
ESTATE OF ILIANA ARIE VELEZ,	§	
DECEASED	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	
	§	345TH JUDICIAL DISTRICT OF
AMAZON.COM, INC.,	§	
AMAZON.COM, LLC,	§	
AMAZON LOGISTICS, LLC,	§	
AMAZON.COM SERVICES, INC.,	§	
JORDAN MICHAEL SANNICOLA,	§	
<i>Defendants.</i>	§	TRAVIS COUNTY, TEXAS

DECLARATION OF STEVE DASGUPTA

My name is Steve DasGupta and pursuant to Texas Civil Practice & Remedies Code Section 132.001, I declare under penalty of perjury that:

1. I am Amazon's Director of North America Surface Transportation Safety commencing in March 2021 to the present. As the Director, I lead the North American Surface Transportation Safety Team. I oversee a team of approximately 100 employees. However, my team interacts with, receives reports from, and relies on the work of numerous other teams, exponentially increasing the number of my indirect reports. Amazon Directors are the third level of management after the presidents and vice-presidents. In the Amazon corporate structure I am considered an executive level employee.

2. As the Director of Amazon's North American Surface Transportation Safety Team, I maintain executive level oversight of motor carriers that provide transportation services to Amazon.

3. In my capacity as the Director of North American Surface Transportation Safety, my duties and responsibilities include overall management of the safety and compliance of our

middle mile transportation operations. I have extremely limited involvement with motor vehicle accidents, individual motor carriers, or their drivers.

4. I was recently informed that Plaintiff in the above referenced matter sought to take my deposition in this case which I have been told involves an accident in which Ms. Velez merged onto I-35 in San Marcos at about 2:15 a.m. on January 3, 2022, colliding with a box truck driven by Jordan Sannicola for Take Flight With B Trucking Company (the “Incident”). I have no direct or intimate personal knowledge about the accident which is the basis of this claim, Defendant Take Flight with B Trucking Company (“Take Flight”), or Defendant Jordan Sannicola. I did not work with, speak to, monitor, supervise, or provide any sort of safety support for Defendants Take Flight or Jordan Sannicola. Furthermore, I did not personally investigate this accident. To be clear, I had no specific involvement with the Incident, its reporting, the persons involved in the Incident, or the carrier, Take Flight, other than following up on its suspension in February 2022, some 6 weeks after the Incident, and after the commencement of this lawsuit.

5. More specifically:

- a. While I’m made aware of all fatal accidents, I have no specific personal knowledge of the facts or circumstances leading up to the incident which forms the basis for this suit.
- b. I was not a witness to the Incident.
- c. To the best of my recollection, I have never met, spoken to, or otherwise communicated with Jordan Sannicola or any of the owners of Take Flight, Karen Sinclair and Shelby Howard. As the director of the North American Surface Transportation Safety team, I generally do not have discussions with the transportation carriers or their drivers.

- d. I do not know, and never have met, the Plaintiff or her daughter.
 - e. I don't recall any direct communication with any Amazon personnel stationed at Amazon San Marcos facility (where I have been advised Iliana Velez worked) or the Amazon Kyle facility which was the destination to which I have been advised Jordan Sannicola was driving at the time of the Incident regarding the Incident or any investigation.
 - f. I did not personally retain nor otherwise request the services of any contractors involved in the Incident, nor do I otherwise have any personal knowledge about their retention.
6. As mentioned, my only involvement with Take Flight was following up on its suspension in February 2022. To the best of my recollection, this involvement began on February 14, 2022. By that time, Amazon had already been served with Ms. Velez's petition. I was contacted initially by Amazon's legal department regarding Amazon's response to this lawsuit. My actions were directed by or in consultation with the Amazon legal department. Other than the Slack conversation, all of my other communications surrounding Take Flight, Mr. Sannicola, this Accident, or Amazon's response to this lawsuit were either initiated by, directed to, or copied members of Amazon legal department. Following my inquiry, Mahendran Hariharan suspended Take Flight for violating the terms of service and poor communication. I have been advised that Mr. Hariharan has been deposed and discussed the suspension.
7. In my role with Amazon, I am not designated to provide testimony on behalf of Amazon relative to the policies, procedures, practices, or documents that govern the work done by the North American Surface Transportation Safety Team.


8. If there are any specific questions related to the subject load, management of motor carrier compliance with the requirements set forth in Amazon's Relay Terms of Service, or any other general safety policy or procedure questions relative to Amazon, there are any number of lower-level members of the North American Surface Transportation Safety Team, an Amazon corporate witness designee, or others who could adequately address such issues.

9. If I were forced to sit for a deposition in this claim, the functioning of Amazon's North American Surface Transportation Safety team would be adversely impacted by my absence. I would be required to gather documents responsive to Plaintiff's subpoena, to prepare for the deposition and to sit for deposition by the Plaintiff. I cannot anticipate how much time might be used to perform these tasks, but taking me away from my normal job responsibilities to perform this work would adversely impact the performance of work relative to safety functions.

10. In my executive role, I am the only Amazon employee with visibility across the North American Surface Transportation Safety team that can assure continuity of operations such that Amazon does not experience a disruption of services. Forcing me to give a deposition would cause a disruption of services to the financial detriment of Amazon.

FURTHER DECLARANT SAYETH NOT

Executed on January 26, 2024 in Indianapolis, IN.

DocuSigned by:

E7C7C06217D54AC...
STEVE DASGUPTA